

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

<b>IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION</b>	<b>MDL No. 2875</b>  <b>HON. ROBERT B. KUGLER CIVIL NO. 19-2875 (RBK)</b>
<b>THIS DOCUMENT RELATES TO ALL CASES</b>	

**PLAINTIFFS' MOTION TO SEAL DOCKET NO. 2560**

Pursuant to Local Rule 5.3, TPP Trial Plaintiffs hereby request that the Court seal Docket No. 2560, an unredacted copy of the TPP Trial Plaintiffs' Statement of Undisputed Material Facts as to Torrent, in the above-captioned matter.

On December 22, 2023, the TPP Trial Plaintiffs inadvertently filed the unredacted copy of the TPP Trial Plaintiffs' Statement of Undisputed Material Facts as to Torrent, rather than the redacted copy. Upon realizing this, the TPP Trial Plaintiffs contacted the Clerk. Plaintiffs also filed an amended, redacted copy of the TPP Trial Plaintiffs' Statement of Undisputed Material Facts as to Torrent, Docket No. 2563, which was identical but for redactions of all quotations from documents marked confidential.

Plaintiffs and Defendants have conferred and Defendants have stated they do not oppose this Motion.

Dated: December 27, 2023

Respectfully submitted,

/s/ Ruben Honik

Ruben Honik

**HONIK LLC**

1515 Market Street, Suite 1100

Philadelphia, PA 19102

Phone: (267) 435-1300

[ruben@honiklaw.com](mailto:ruben@honiklaw.com)

/s/ Daniel Nigh

Daniel Nigh

**NIGH, GOLDBERG, RASO, &  
VAUGHN PLLC**

14 Ridge Square NW, 3<sup>rd</sup> Floor

Washington DC 20016

Phone: (202) 792-7927

[dnigh@nighgoldenberg.com](mailto:dnigh@nighgoldenberg.com)

/s/ Adam Slater

Adam Slater

**MAZIE, SLATER, KATZ &  
FREEMAN, LLC**

103 Eisenhower Pkwy, 2nd Flr.

Roseland, NJ 07068

Phone: (973) 228-9898

[aslater@mazieslater.com](mailto:aslater@mazieslater.com)

/s/ Conlee S. Whiteley

Conlee S. Whiteley

**KANNER & WHITELEY, LLC**

New Orleans, LA 70130

Phone: (504)-524-5777

[c.whiteley@kanner-law.com](mailto:c.whiteley@kanner-law.com)

***MDL Plaintiffs' Co-Lead Counsel***

/s/ Jorge Mestre

Jorge Mestre

**RIVERO MESTRE LLP**

2525 Ponce de Leon Blvd., Suite 1000

Miami, FL 33134

Phone (305) 445-2500

[jmestre@riveromestre.com](mailto:jmestre@riveromestre.com)

/s/ Gregory P. Hansel

Gregory P. Hansel

**PRETI, FLAHERTY, BELIVEAU &  
PACHIOS, CHARTERED, LLP**

One City Center

P.O. Box 9546

Portland, ME 04112

Phone: (207) 791-3000

[ghansel@preti.com](mailto:ghansel@preti.com)

***Third-Party Payor Economic  
Loss Co-Lead Class Counsel***